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Spirit of Service

November 14, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

> **Re: WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming**
>
> **Subject: Qwest's Stand Alone Test Environment (SATE)**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in the referenced proceeding in response to the following question from the Commission staff regardmg Qwest's Stand Alone Test Environment (SATE).

Question: The staff asked Qwest to provide additional information regarding Qwest's assertion that, prior to implementing requested changes in SATE IMA release 11.0, CLECs were able to run pre-order and order directory listing testing, citing the Qwest III Reply Declaration on Operations Support Systems of Lynn M V Notarianni and Christie L. Doherty, ¶ 168. The staff asked Qwest to describe how the Facility Based Directory Listing (FBDL) capabdity in the Interoperability environment is similar to and/or varies from the newly added testing available in SATE (the abdity to run the pre-order test listings reconciliation query).
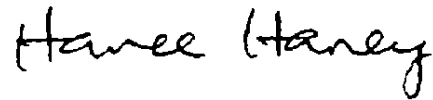
Response: Testing FBDL and the pre-order Listings Reconciliation Query is fundamentally the same whether the CLEC chooses to test these products in the Interoperability Environment or the Stand Alone Test Environment. Both environments utilize a copy of the production system and provide test data for CLEC use. The following table specifies how the environments are similar and also explains any minor differences.

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	Interoperability Environment	**SATE Environment**
Software – FBDL & Listing Reconciliation (functionality)	Utilizes a copy of the production systems.	Utilizes a copy of the production systems.
Data-FBDL (order)	Data provided in the Facility Hased (FB) Directory Listings EDI Interoperability Test Document Test scenarios must be run sequentially, as each successful scenario provides the data for the next scenario.	Data provided in the SATE Data Document. Test scenarios can be run in any order.
Data-Listing Reconciliation (pre-order) with FBDL	If the CLEC is also testing FBDL, the data provided in the Facility Based (FB) Directory Listings EDI Interoperability Test Document can be used.	Data provided in the SATE Data Document.
Data-Listing Reconciliation (pre-order) without FBDL	If the CLEC is not also testing FBDL, Qwest will provide the data to the CLEC as part of the CLEC's EDI testing.[1]	Data provided in the SATE Data Document.
Responses	To mirror production, responses are provided each morning after the overnight syslrm batch processes are run.	To mirror production, responses are provided each morning after the overnight system batch processes are run.
Database Refrer	Any listing addition, change, or deletion is reflected in the database for CLEC use on future transactions	Each morning, the database is refreshed; reverting all data to its state prior to the test FBDL transaction.

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[1] Only one CLEC to date has asked to test this capability without also implementing FHDL. Although Qwest initially believed that it would be feasible for a CLEC to use its own production data in the test environment, Qwest later discovered that there might be practical problems with doing so, and thus will provide CLECs the data needed for testing, which is data already available in the SATE Data Document.

The 20-page limit does not apply to this filing.

Sincerely,

R. Hance Haney

cc: E. **Yockus**
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